

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

PUERTO RICO SOCCER LEAGUE NFP CORP.,
a Puerto Rico for profit corporation, JOSEPH
MARC SERRALTA IVES, JUAN M. CORNEJO,
MARIA LARRACUENTE, JOSE R. OLMO-
RODRIGUEZ, and FUTBOL BORICUA (FBNET),
Inc.,

Plaintiffs,

v.

FEDERACION PUERTORRIQUENA DE
FUTBOL, INC., IVAN RIVERA-GUTIERREZ,
JOSE “CUKITO” MARTINEZ, GABRIEL ORTIZ,
LUIS MOZO CANETE, JOHN DOES 1-18,
INSURANCE COMPANIES A, B, C,
FÉDÉRATION INTERNATIONALE DE
FOOTBALL ASSOCIATION (FIFA), and
CONFEDERATION OF NORTH, CENTRAL
AMERICA AND CARIBBEAN ASSOCIATION
FOOTBALL (CONCACAF),

Defendants.

CIVIL ACTION NO. 23-1203-
RAM

**DEFENDANT FÉDÉRATION INTERNATIONALE DE FOOTBALL
ASSOCIATION’S MOTION TO RESTRICT AND
MEMORANDUM OF LAW IN SUPPORT THEREOF**

TO THE HONORABLE COURT:

COMES NOW the Fédération Internationale de Football Association (“FIFA”), by and through its undersigned counsel, and respectfully states and prays as follows:

On April 10, 2025, this Court ordered sanctions against Plaintiffs’ counsel after determining that they filed four briefs (ECF Nos. 174–177, together, the “Sanctioned Briefs”) that contained a myriad of cases that did not exist, quotations that did not appear in their attributed cases, and cases that were entirely misrepresented. ECF No. 206 (the “Order”). As a result of this misconduct, the Court ordered Plaintiffs’ counsel to “pay the attorneys’ fees incurred by [FIFA,

CONCACAF and the FPF Defendants], in relation to Plaintiffs’ filings,” and ordered Defendants to “submit an itemized application for attorney’s fees” reflecting the fees incurred. Order at 10.

It is well established that a party seeking an award of attorneys’ fees must provide sufficient evidence supporting both the hours worked and the rates claimed. Adequate documentation includes “sufficient detail [to allow] a neutral judge [to] make a fair evaluation of the time expended, [and] the nature and need for the service.” *Hensley v. Eckerhart*, 461 U.S. 424, 441 (1983) (Burger, C.J., concurring). Pursuant to *In the Matter of: Amendment to the Restricted Filing and Viewing Levels Module*, 2013 Standing Order No. 9 (“Standing Order No. 9”),¹ FIFA respectfully requests leave of Court to file under seal the itemized application for attorneys’ fees in connection with this matter, restricting viewing to participants within the case. Compelling reasons and good cause exist to restrict access to Exhibit A to the Boening Declaration and Exhibit A to the Cámara-Fuertes Declaration that FIFA filed in connection with FIFA’s Application for Attorneys’ Fees and for certain limited redactions in FIFA’s Application for Attorneys’ Fees

In the First Circuit, “compelling reasons” are necessary to justify sealing or restricting materials filed with the court. *United States v. Kravetz*, 706 F.3d 47, 59 (1st Cir. 2013). The right of public access “is a qualified right that may be outweighed by competing interests in a given case.” *In re Providence J. Co., Inc.*, 293 F.3d 1, 13 (1st Cir. 2002). “Compelling reasons” include sealing a document to prevent disclosure of “business information that might harm a litigant’s competitive standing.” *Kravetz*, 706 F.3d at 61; *quoting Nixon v. Warner Commc’ns, Inc.*, 435 U.S. 589, 598 (1978).

¹ “Permission to utilize a particular restricted filing and viewing level shall be requested by filing a ‘Motion to Restrict’ which shall be open to public inspection and shall identify the restriction level sought, address the interest to be protected, and indicate why such interest outweighs the presumption of public access.” Standing Order No. 9, at 4.

The documents FIFA seeks to seal—the detailed billing records including attorney time entries and legal services provided by FIFA’s counsel—are properly filed under restriction because they contain sensitive business information. *See, e.g., Carrero v. Molina Healthcare of Puerto Rico, Inc.*, 3:21-cv-01605, ECF. No. 81 (D.P.R. Oct. 10, 2023) (granting a motion to seal a motion for attorneys’ fees and costs and corresponding legal invoices); *Sir Speedy, Inc. v. Nieto*, 04-cv-02029, ECF. No. 62 (D.P.R. Aug. 31, 2007) (same); *Pineiro Diaz v. Adchem Pharma Operations*, 2005 WL 2397489, at *1 (D.P.R. Sept. 28, 2005) (same). The documents to be sealed contain sensitive and detailed information regarding legal services provided to FIFA in response to the Sanctioned Briefs. There is no public interest in FIFA’s counsel’s time entries and disclosure of such highly confidential business records would result in harm. Sealing the itemized application for attorneys’ fees is a narrowly tailored measure designed to protect strategically sensitive non-public material while still enabling the Court to conduct a thorough review of the merits of the request.

However, should the Court determine that sealing is not warranted in full, FIFA respectfully requests leave to propose targeted redactions to Exhibit A to the Boehning Declaration and Exhibit A to the Cámara-Fuertes Declaration to protect any sensitive information from public disclosure in accordance with Federal Rule of Civil Procedure 5.2(d).

WHEREFORE, FIFA respectfully requests leave to file its *Application for Attorneys’ Fees* under seal, with access restricted solely to the captioned parties or, in the alternative, should the Court deny the request to seal in full, the undersigned respectfully seeks leave to file a redacted version of the submission, narrowly tailored to omit only those portions containing confidential, proprietary, or commercially sensitive information that is not appropriate for public disclosure.

CERTIFICATE OF SERVICE: We hereby certify that on this same date, the foregoing motion was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants.

RESPECTFULLY SUBMITTED.

Dated: May 1, 2025

FERRAIUOLI, LLC

/s/ Roberto A. Cámara-Fuertes

Roberto A. Cámara-Fuertes

USDC-PR No. 219002

Suleicka Tulier-Vazquez

USDC-PR No. 305111

P.O. Box 195168

San Juan, PR 00919-5168

Tel: (787) 766-7000

Fax: (787) 766-7001

Email: rcamara@ferraiuoli.com

stulier@ferraiuoli.com

PAUL, WEISS, RIFKIND,

WHARTON & GARRISON LLP

H. Christopher Boehning (*pro hac vice*)

1285 Avenue of the Americas

New York, New York 10019-6064

Tel: (212) 373-3000

Fax: (212) 757-3990

Email: cboehning@paulweiss.com

Attorneys for Defendant FIFA

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

Dated: May 1, 2025.
San Juan, Puerto Rico

/s/ Roberto A. Cámara-Fuertes
Roberto A. Cámara-Fuertes
USDC-PR No. 219002
Ferraiuoli LLC
San Juan, PR 00919-5168
rcamara@ferraiuoli.com
Phone: (787) 766-7000
Fax: (787) 766-7001